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*NOT ADMITTED TO THE NEW YORK BAR

U.S. SDNY
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MEMO ENDORSED

July 2, 2009

By HandThe Honorable Richard J. Sullivan
United States District Court, Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007Re: *S.E.C. v. Nicos Achilleas Stephanou, et al*, 09 Civ. 01043 (RJS)

Dear Judge Sullivan:

We represent defendant Joseph Contorinis in the above referenced action, and in a related criminal matter, *U.S. v. Joseph Contorinis*, 09 Mag. 289 (not yet assigned). The United States Attorney's Office has told us that with our consent, they will seek a further 30 day adjournment of the preliminary hearing date in that case.

As stated in the pre-motion conference of June 24, 2009, the United States Attorney's Office is still considering whether or not to indict Mr. Contorinis. We have met with the government as recent as this week, and have been informed that either way the decision on whether to charge Mr. Contorinis will be made soon.

As such we respectfully submit our requests for a 30 day extension of time with respect to the Case Management Plan and Scheduling Order, as it pertains to Mr. Contorinis. George Paparrizos, Michael Koulourodos and Ramesh Chakrapani either consent or take no position as to this extension. We have reached out to, but not heard back from Archilleas Stephanou and the S.E.C.

Specifically, we request an extension of Mr. Contorinis' answer (to August 5, 2009), Mr. Contorinis' initial disclosures, production of documents and

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The Honorable Richard J. Sullivan
July 2, 2009

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responses to interrogatories and objections (to August 7, 2009). All other dates and the remainder of the discovery schedule as contemplated by the Case Management Plan would remain the same.

If Your Honor approves of this extension, we respectfully ask that the Court "so order" this letter.

Respectfully submitted,



Liad Levinson

Dated: July ____, 2009
New York, New York

SO ORDERED
Honorable Richard J. Sullivan
United States District Judge

cc: Tami Scarola Stark, Esq.
Kingdon Kase, Esq.
Jeffrey Boujoukos, Esq.
Michael S. Sommer, Esq.
Russell Todd Neufeld, Esq.
Todd Jeffrey Maybrown, Esq.
Michael Fred Bachner, Esq.

*Request denied.
Defendant Contorinis
shall answer the
Complaint by July 13, 2009.
All other dates set
forth in the May 27, 2009
Case Management Plan shall
remain intact.*

SO ORDERED
Dated: 7/6/09

[Signature]
RICHARD J. SULLIVAN
U.S.D.J.